



September 21, 1988

Lordstown Complex

Mr. James J. Brossman
Chief OH/MN Technical Enforcement
Section
United States Environmental
Protection Agency, Region V
230 South Dearborn Street
Chicago, Illinois 60604

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SEP 27 1988
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Dear Mr. Brossman:

General Motors, BOC Lordstown is providing this in response to the Notice of Violation of August 23, 1988, in which alleged violations of RCRA land disposal restrictions were cited. GM would like to offer the following comments on the identified items:

Item I.

At the time of the inspection of April 26, 1988, we were still inappropriately shipping various wastes under the F006 designation. These wastes were wastewater treatment plant sludge, and grit separator sludge. The definition of the F006 classification had been clarified by Federal Register 12/2/86 page 45350. This particular publication stated that wastewater treatment sludges from phosphate operations are no longer defined as listed hazardous waste or F006. Since the time of the inspection of April 26, 1988, the aforementioned wastes have been properly reclassified as non-hazardous wastes in accord with the December, 1986 Federal Register.

Item 2

Reclassifying the various wastewater treatment plant sludges from the listed F006 to a non-hazardous designation (reference item 1) will require no revisions of current Waste Analysis Plan.

However, this plan is currently being revised to include the analysis of the "California List" parameters for any liquid hazardous waste that may be generated where an engineering determination would not yield sufficient information.

Item 3

We have sent notifications with each shipment of land disposal restricted hazardous waste except for the inappropriately classified F006 sludge mentioned in item I.

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Item 4

A review of our operating records showed that four drums of virgin methylene chloride entered our hazardous waste storage area on January 22, 1986. In between the time these drums were received at the plant and placed into production, it was decided by Lordstown Hazardous Material Review Committee that methylene chloride should no longer be used within the facility. Environmental personnel decided that the best place to store these drums would be the hazardous waste drum storage area. On the hopes that this material could be either returned to the vendor and sold as virgin on a waste exchange; we did not classify it as waste. However, around August, 1987, it became apparent that these paths were not viable and that these drums should be sent to a hazardous waste reclaimer. This waste was shipped September 20, 1988.

Item 5


Reclassifying the various wastewater treatment plant sludges from the listed F006 to a non-hazardous designation (reference Item I) no longer requires any specific tests as stated in Section 268.32.

However, under the revision of our Waste Analysis Plan results of tests or engineering determinations for the "California List" waste are to be incorporated into our Operating Record.

Item #6

As mentioned to the State Inspector, we were completing the installation of a roof over our drum storage pad. Because of the construction activities many drums had to be moved such that the required amount of aisle space was not provided. These drums have been repositioned so that there is sufficient aisle space to conduct inspections, and to provide for the unobstructed movement of emergency and spill control equipment. Please note that during the inspection the drums that the inspector observed were properly labeled and dated. Our own inspections also revealed that all drums in our storage area were properly identified and dated.

Should you have any questions regarding our submittal, please contact Mr. Ben Kristan at (216) 824-5795.


JOHN DOHERTY
Area Manager
Plant Engineering

BSK/mba

c: M. J. Cubbin Ms. S. Slone Ms. C. McCord B. S. Kristan